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Attorney for Defendant  
 CRISTETA LAGAREJOS

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR-08-0477 DLJ
	)	
Plaintiff,	)	
	)	
v.	)	<b>STIPULATED MOTION AND</b>
	)	<b>PROPOSED ORDER TO</b>
	)	<b>ALLOW DEFENDANT TO TRAVEL</b>
	)	<b>TO THE EASTERN DISTRICT</b>
CRISTETA LAGAREJOS,	)	<b>OF CALIFORNIA AND NEVADA</b>
	)	
	)	No Hearing Requested
Defendant.	)	
	)	

The defendant CRISTETA LAGAREJOS, through her attorney John J. Jordan, hereby moves for an order allowing the defendant to travel to the Eastern District of California and the District of Nevada between August 22, 2008 and August 25, 2008, in order to attend a previously scheduled short vacation in Lake Tahoe.

1. The defendant is currently on pre-trial release in the above-entitled case. Her current conditions of release restrict her travel to the Northern District of California.

2. The defendant is currently in compliance with the conditions of her pre-trial release.

3. Ms. Lagarejos would like to attend this previously scheduled vacation with her partner, which was planned before the

1 current indictment was returned. Counsel for defendant has only  
2 recently been provisionally appointed and was unable to bring the  
3 motion at an earlier time.

4 4. United States Pre-Services Officer Hence Williams has  
5 informed counsel that he has no objection to this request, as  
6 long as the defendant provides a travel itinerary to his office  
7 in advance of defendant's travel.

8 5. On August 20, 2008, Assistant U.S. Attorney Deborah R.  
9 Douglas, the prosecutor in this case, informed counsel that she  
10 has no objection to this request.

11 WHEREFORE, the defendant respectfully requests  
12 that this Court issue an order allowing the defendant to travel  
13 between the Northern District of California and the Eastern  
14 District of California and the District of Nevada from August 22,  
15 2008 until August 25, 2008.

16 Dated: August 20, 2008 Respectfully submitted,  
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20 JOHN J. JORDAN  
21 Attorney for Cristeta Lagarejos  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) No. CR-08-0477 DLJ  
)  
Plaintiff, )  
)  
(Proposed) **ORDER**  
v. )  
)  
CRISTETA LAGAREJOS, )  
)  
Defendant. ) No Hearing Requested  
\_\_\_\_\_)

FOR GOOD CAUSE SHOWN, the pretrial release conditions of the defendant CRISTETA LAGAREJOS are amended to allow the defendant to travel between the Northern District of California and the Eastern District of California and the District of Nevada from August 22, 2008 until August 25, 2008, all other release conditions to remain unchanged.

Prior to any such travel, the defendant is to provide a travel itinerary to United States Pretrial Services.

**IT IS SO ORDERED**

Date: August \_\_, 2008

\_\_\_\_\_  
HON. D. LOWELL JENSEN  
United States District Judge